

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

Index No.: \_\_\_\_\_

\_\_\_\_\_  
NAOMI DENT,

Plaintiff,

**VERIFIED COMPLAINT**

-against-

THE CITY OF NEW YORK, ADMINISTRATION FOR  
CHILDREN'S SERVICES, SCO FAMILY OF SERVICES,  
STEVEN TAYLOR and MYRTICE TAYLOR,Defendants.  
\_\_\_\_\_

Plaintiff, by her attorneys, GREGORY J. CANNATA & ASSOCIATES, LLP, as and for a  
Verified Complaint herein, respectfully sets forth and alleges:

**AS AND FOR A FIRST CAUSE OF ACTION**

1. That in 2006 the plaintiff NAOMI DENT was a resident of Kings County.
2. That at all times hereinafter mentioned, the defendant THE CITY OF NEW YORK was a municipal corporation duly existing under and by virtue of the laws of the State of New York.
3. That at all times hereinafter mentioned, the defendant ADMINISTRATION FOR CHILDREN'S SERVICES (ACS) was an agency of the CITY OF NEW YORK operating under and by virtue of the laws of the CITY OF NEW YORK.
4. That at all times hereinafter mentioned, the defendant SCO FAMILY OF SERVICES was a domestic not-for-profit corporation duly existing under and by virtue of the laws of the State of New York.
5. That at all times hereinafter mentioned, the defendant SCO FAMILY OF SERVICES was a not-for-profit corporation doing business in the State of New York.

6. That at all times hereinafter mentioned Defendant STEVEN TAYLOR was an individual residing in Nassau County and State of New York.

7. That at all times hereinafter mentioned Defendant MYRTICE TAYLOR was an individual residing in Nassau County and State of New York.

8. That at all times hereinafter mentioned, the defendant THE CITY OF NEW YORK, operated ACS in conjunction with its municipal function.

9. That pursuant to an order of the Kings County Family Court, Defendant CITY OF NEW YORK and ACS placed Plaintiff NAOMI DENT in foster care.

10. That commencing in approximately December 2006 or January 2007, the Defendant CITY OF NEW YORK through New York City Administration for Children's Services petitioned the Kings Family Court to an order to place Plaintiff, NAOMI DENT in foster care.

11. That in approximately January 2007, the plaintiff NAOMI DENT came under the care, custody and/or jurisdiction of the defendants, THE CITY OF NEW YORK, and/or its servants, agents, representatives and/or employees of ACS.

12. That in approximately January 2007, the Defendant CITY OF NEW YORK placed Plaintiff, NAOMI DENT, under the care, custody, and supervision of Defendants STEVEN TAYLOR and MYRTICE TAYLOR.

13. That in approximately January 2007, the Defendant CITY OF NEW YORK placed Plaintiff, NAOMI DENT, under the care, custody, and supervision of Defendants STEVEN TAYLOR and MYRTICE TAYLOR pursuant to an order of the Kings County Family Court.

14. That at all times hereinafter mentioned, the defendant SCO FAMILY OF SERVICES, its servants, agents, representatives and/or employees operated a foster care agency.

15. That at all times hereinafter mentioned, the defendant SCO FAMILY OF SERVICES, entered into an agreement with the defendant THE CITY OF NEW YORK and/or ACS, relative to certain foster care and/or custody services to be provided by SCO FAMILY OF SERVICES.

16. That commencing in approximately January 2007, the Defendant SCO FAMILY OF SERVICES continued the placement of NAOMI DENT in the home of STEVEN TAYLOR and MYRTICE TAYLOR.

17. That beginning at some point after January 2007, Defendant STEVEN TAYLOR sexually abused Plaintiff NAOMI DENT.

18. That Defendant STEVEN TAYLOR sexually abused Plaintiff NAOMI DENT while in the course of his role as her foster parent.

19. That Defendant MYRTICE TAYLOR enabled the abuse of the plaintiff and failed to report or stop the abuse.

20. That at all times hereinafter mentioned, it was the duty of the defendant THE CITY OF NEW YORK, its servants, agents, representatives and/or employees of ACS, to ensure that Defendants STEVEN TAYLOR and MYRTICE TAYLOR were duly qualified and capable of rendering such services as would be required in conjunction with the care and custody of a child as foster parents.

21. That at all times hereinafter mentioned, it was the duty of the defendant SCO FAMILY OF SERVICES, its servants, agents, representatives and/or employees to ensure that Defendants STEVEN TAYLOR and MYRTICE TAYLOR were duly qualified and capable of rendering such services as would be required in conjunction with the care and custody of a child as a foster parents.

22. That at all times hereinafter mentioned, it was the duty of the defendant THE CITY OF NEW YORK, its servants, agents, representatives and/or employees of ACS to conduct a proper, adequate and thorough investigation relative to the character, integrity, stability, honor, morality, virtue and background of families and family members chosen, selected and/or designated as foster care families to whom the care, custody and foster home placement of children, including the plaintiff herein, could and/or would be entrusted, and to provide for and/or ensure the safety, supervision, protection and well-being of children who were assigned to and/or placed within the custody of said foster homes, including the plaintiff herein.

23. That at all times hereinafter mentioned, it was the duty of the defendant THE CITY OF NEW YORK, its servants, agents, representatives and/or employees of ACS to ensure that said foster care agency known as SCO FAMILY OF SERVICES conduct a proper, adequate and thorough investigation relative to the character, integrity, stability, honor, morality, virtue and background of families and family members chosen, selected and/or designated as foster care families to whom the care, custody and foster home placement of children, including the plaintiff herein, could and/or would be entrusted.

24. That at all times hereinafter mentioned, it was the duty of the defendant SCO FAMILY OF SERVICES, its servants, agents, representatives and/or employees to conduct a proper, adequate and thorough investigation relative to the character, integrity, stability, honor, morality, virtue and background of families and family members chosen, selected and/or designated as foster care families to whom the care, custody and foster home placement of children, including the plaintiff herein, could and/or would be entrusted, and to provide for and/or ensure the safety, supervision, protection and well-being of children who were assigned to and/or placed within the custody of said foster homes, including the plaintiff herein.

25. That at all times hereinafter mentioned, it was the duty of the Defendant, THE CITY OF NEW YORK, ACS and/or their servants, agents, representatives and/or employees to report any signs of maltreatment and/or abuse to the children while in the foster care homes.

26. That at all times hereinafter mentioned, it was the duty of the Defendant, SCO FAMILY OF SERVICES, its servants, agents, representatives and/or employees to report any signs of maltreatment and/or abuse to the children while in the foster care homes.

27. That at all times hereinafter mentioned, it was the duty of the Defendant, MYRTICE TAYLOR to report any signs of maltreatment and/or abuse to the children in her foster care home.

28. That the Defendant, THE CITY OF NEW YORK and/or ACS are vicariously liable for the acts of its servants, agents, representatives and/or employees, including the acts of Defendant STEVEN TAYLOR and MYRTICE TAYLOR, under the theory of respondent superior.

29. That the Defendant SCO FAMILY OF SERVICES is vicariously liable for the acts of its servants, agents, representatives and/or employees, including the acts of Defendant STEVEN TAYLOR and MYRTICE TAYLOR, under the theory of respondent superior.

30. That the Defendant, THE CITY OF NEW YORK, had at all relevant times a relationship of in loco parentis with the Plaintiff, NAOMI DENT.

31. That the Defendant, SCO FAMILY OF SERVICES, had at all relevant times a relationship of in loco parentis with the Plaintiff, NAOMI DENT.

32. That at all times hereinafter mentioned, the plaintiff was caused to be sexually assaulted, sexually abused, menaced, attacked, assaulted, battered, threatened with force and

physical harm, and psychologically damaged while in the care and custody of said foster home in violation of Penal Law 130 and Penal Law 225.25-225.27.

33. That at all times hereinafter mentioned, the plaintiff was caused to be sexually assaulted, sexually abused, menaced, attacked, assaulted, battered, threatened with force and physical harm, and psychologically damaged by Defendant STEVEN TAYLOR in violation of Penal Law 130 and Penal Law 225.25-225.27.

34. That at all times herein mentioned, the defendants, THE CITY OF NEW YORK, ACS, and SCO FAMILY OF SERVICES, their servants, agents, representatives and/or employees negligently failed to ensure that said foster care agency conducted a proper, adequate and thorough investigation relative to the character, integrity, stability, honor, morality, virtue and background of the family and family members chosen, selected and/or designated as a foster care family to whom the care, custody and foster home placement of the plaintiff herein, was entrusted.

35. That at all times herein the defendants, THE CITY OF NEW YORK, ACS, and SCO FAMILY OF SERVICES, their servants, agents, representatives and/or employees negligently failed to provide for and/or ensure the safety, supervision, protection and well-being of the plaintiff while she was assigned to and/or placed within the custody of said foster care agency.

36. That at all times herein mentioned, the defendants, their servants, agents, representatives and/or employees negligently failed to ensure that the foster home in which the plaintiff herein was placed, was safe, suitable and appropriate for such foster home placement and care.

37. That at all times herein mentioned, the defendants, their servants, agents, representatives and/or employees failed to negligently ensure that all appropriate rules, regulations

and procedures prerequisite to designation, assignment and/or placement in foster homes be performed, followed and complied with.

38. That at all times herein mentioned, the defendants, their servants, agents, representatives and/or employees negligently failed to report incidents of maltreatment to the plaintiff while under the care and custody of the foster care parent STEVEN TAYLOR.

39. That at all times herein mentioned, the defendants, their servants, agents, representatives and/or employees negligently failed to continually supervise the plaintiff while under the care and custody of the foster care parent STEVEN TAYLOR.

40. That at all times herein mentioned, the defendants, their servants, agents, representatives and/or employees negligently failed to remove the Plaintiff, NAOMI DENT, from the foster care home of STEVEN TAYLOR.

41. That by reason of the foregoing, the plaintiff was injured.

42. That the foregoing occurrences and the resulting injuries to the plaintiff were caused solely by reason of the carelessness, negligence, gross negligence, recklessness and wanton disregard on the part of the defendants and without any negligence on the part of the plaintiff contributing thereto.

43. That this action falls within one or more of the exceptions set forth in C.P.L.R. 1602.

44. Pursuant to CPLR Section 1602(2)(iv), defendants are jointly and severally liable for all of plaintiffs' damages, including but not limited to plaintiffs' non-economic loss, irrespective of the provisions of the CPLR Section 1601, by reason of the fact that defendants owed the plaintiffs' a non-delegable duty of care.

45. Pursuant to CPLR Section 1602(7), defendants are jointly and severally liable for all of plaintiffs' damages, including but not limited to plaintiffs' non-economic loss, irrespective of the provisions of the CPLR Section 1601, by reason of the fact that defendants acted with reckless disregard of the safety of others.

46. Pursuant to CPLR Section 1602(2)(iv), the defendants are jointly and severally liable for all of plaintiffs' damages, including but not limited to plaintiffs' non-economic loss, irrespective of the provisions of the CPLR Section 1601, by reason of the fact that said defendants are vicariously liable for the negligent acts and omissions of each other and/or others who caused or contributed to the plaintiffs' damages.

47. Pursuant to CPLR Section 1602(11), defendants are jointly and severally liable for all of plaintiffs' damages, including but not limited to plaintiffs' non-economic loss, irrespective of the provisions of the CPLR Section 1601, by reason of the fact that defendants acted knowingly or intentionally, and in concert, to cause the acts or failures which are a proximate cause of plaintiffs' injuries.

48. That this lawsuit is being commenced within the time limitations of CPLR 214-G pursuant to the Child Victim's Act.

49. That a Notice of Claim is not required to be served upon the CITY OF NEW YORK pursuant to CPLR 214-G of the Child Victim's Act.

50. That by reason of the foregoing, the plaintiff has been severely and permanently damaged in an amount which exceeds the monetary jurisdictional limits of any and all lower Courts which would otherwise have jurisdiction herein, in an amount to be determined upon the trial of this action.



**AS AND FOR A SECOND CAUSE OF ACTION**

51. That plaintiff repeats, reiterates and realleges each and every allegation as contained in the First Cause of Action of the within Complaint with the same force and effect as though each were more fully set forth at length herein.

52. That at all times hereinafter mentioned, plaintiff was physically, sexually, and mentally abused, assaulted, unlawfully imprisoned, harassed, injured, sexually and/or physically attacked, and molested by defendant STEVEN TAYLOR.

53. That by reason of the foregoing, this plaintiff was severely injured and damaged.

54. That the foregoing occurrence, and the resulting injuries to the plaintiff, were caused solely by reason of the intent and/or recklessness on the part of defendant STEVEN TAYLOR, and without any negligence, cause or provocation on the part of the plaintiff contributing thereto.

55. That by reason of the foregoing, the plaintiff has been severely and permanently damaged in an amount which exceeds the monetary jurisdictional limits of any and all lower Courts which would otherwise have jurisdiction herein, in an amount to be determined upon the trial of this action.

**AS AND FOR A THIRD CAUSE OF ACTION**

56. That plaintiff repeats, reiterates and realleges each and every allegation as contained in the First and Second Causes of Action of the within Complaint with the same force and effect as though each were more fully set forth at length herein.

57. That defendant STEVEN TAYLOR acted with gross negligence, and a wonton disregard for the safety of the plaintiff in sexually abusing her and in so doing, foreseeably, severely, permanently, and irreparably injured the plaintiff.

58. That as a result, defendant STEVEN TAYLOR is liable to plaintiff for punitive damages.

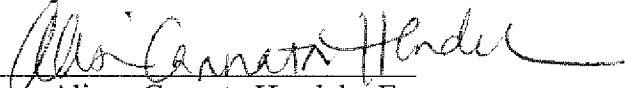
59. That by reason of the foregoing, the plaintiff has been damaged in an amount which exceeds the monetary jurisdictional limits of any and all lower Courts which would otherwise have jurisdiction herein, in an amount to be determined upon the trial of this action.

WHEREFORE, plaintiff demands judgment against the defendants, the amount sought on each cause of action exceeding the monetary jurisdictional limits of any and all lower Courts which would otherwise have jurisdiction herein, in an amount to be determined upon the trial of this action, together with the costs and disbursements of this action, and with interest from the date of this accident.

Dated: New York, New York  
October 14, 2019

GREGORY J. CANNATA & ASSOCIATES, LLP  
Attorneys for Plaintiffs

By:

  
Alison Cannata Hendele, Esq.

Attorneys for Plaintiff  
60 East 42nd Street, Suite 932  
New York, New York 10165  
(212) 553-9205

## PLAINTIFF'S VERIFICATION

STATE OF NEW YORK


SS:

COUNTY OF NEW YORK

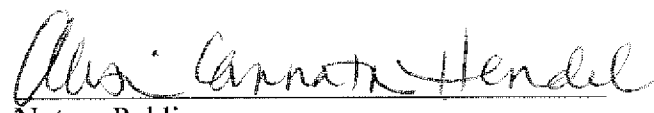
NAOMI DENT, being duly sworn, says:

I am a Plaintiff in the action herein: I have read the annexed COMPLAINT and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. My belief as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my personal files.

Dated: New York, New York  
October 14, 2019

  
\_\_\_\_\_  
NAOMI DENT

Sworn to before me this 14 day of October, 2019

  
\_\_\_\_\_  
Notary Public

ALISON CANNATA HENDELE  
Notary Public, State of New York  
No. 02HE622894  
Qualified in Westchester County  
Commission Expires July 03, 2022